

4. LAND USE/TRANSPORTATION ANALYSIS PROGRAM

4.A BACKGROUND

The Land Use/Transportation Analysis Program is one of three components of the CMP that address future problems or deficiencies on the transportation system. The other components, annual modeling of the CMP system and deficiency plans, are discussed in Chapters 7 and 8 of this document, respectively.

In addition, the CMA Board of Directors' policy provides that the countywide Comprehensive Transportation Plan (CTP) will define the actions, projects, or strategies to be implemented through area wide deficiency plans to maintain mobility for people and goods.

The detailed procedures for implementing this CMP element are specified in Appendix C. An addendum to Appendix C will be developed through the CMPTAC, subject to approval by the CMA Board of Directors, to specify an alternate, streamlined process to be followed only within areas covered by deficiency plans. The framework for the alternate process is discussed below.

4.A.1 LEGAL REQUIREMENTS

California Government Code Section 65089 (b)(4) states the requirements for analysis of the impacts of land use decisions on the regional transportation system as defined by the CMP:

"The program shall contain . . . a program to analyze the impacts of land use decisions made by local jurisdictions on regional transportation systems, including an estimate of the costs associated with mitigating those impacts. This program

shall measure, to the extent possible, the impact to the transportation system using the performance measures described in paragraph (2) (the performance measures element of the CMP). In no case shall the program include an estimate of the costs of mitigating the impacts of interregional travel. The program shall provide credit for local public and private contributions to improvements to regional transportation systems. However, in the case of toll road facilities, credit shall only be allowed for local public and private contributions which are unreimbursed from toll revenues or other state or federal sources. The agency shall calculate the amount of the credit to be provided. The program defined under this section may require implementation through the requirements and analysis of the California Environmental Quality Act, in order to avoid duplication."

Government Code Section 65089.7 places limitations on projects required to be analyzed through the Land Use/Transportation Analysis Program:

"A proposed development specified in a development agreement entered into prior to July 10, 1989, shall not be subject to any action taken to comply with this chapter, except actions required to be taken with respect to travel demand element of a congestion management program pursuant to paragraph (3) of subdivision (b) of Section 65089." In addition, Section 65089.3 (a) of the Government Code requires the Congestion Management Agency (CMA) to:

"monitor the implementation of all elements of the congestion management program. At least biennially, the agency

shall determine if the county and cities are conforming to the congestion management program, including, but not limited to, all of the following:

...c) Adoption and implementation of a program to analyze the impacts of land use decisions, including the estimate of the costs associated with mitigating these impacts.

(d) Adoption and implementation of a deficiency plan pursuant to Section 65089.4 when highway and roadway level of service standards are not maintained on portions of the designated system.

These sections of the Government Code obligate each jurisdiction to either maintain the level of service standard on the CMP road system by mitigating the impacts of that jurisdiction's land use decisions, or to prepare and implement a deficiency plan to either return the level of service to the CMP standard, or provide for system wide transportation performance and air quality improvements (which may, at local discretion, not include returning the facility to the CMP LOS standard).

Each local jurisdiction has adopted and is implementing a Land Use/Transportation Analysis Program designed to be consistent with the guidelines provided in Appendix C of this document. Failure of a local jurisdiction to address an exceedance of the level of service standard on the CMP system, or failure to implement a consistent Land Use/Transportation Analysis Program, would result in the CMA finding the local jurisdiction not in compliance with the CMP. This finding would be transmitted to the state Controller's office, which would result in withholding, or ultimately, loss of the jurisdiction's share of the Proposition 111 increase in gas tax funds.

Upon approval of an area wide deficiency plan pursuant to Government Code Section 65089.4 and the Deficiency Plan element of the CMP (Chapter 8), the land use/transportation analysis program within the area encompassed by the deficiency plan will change. The focus of the land use/transportation analysis program as it applies to projects within such an area will depend on whether the land use change or project is consistent with the growth forecast used to develop the deficiency plan.

If the land use change or project is consistent with the growth projection, the role of the Traffic Impact Analysis is principally to provide for timely phasing of transportation projects or strategies already identified for that area by the CTP and incorporated into the deficiency plan. In this way, it provides a basis for the implementation schedule that must be included within the deficiency plan's action plan.

If the land use change or project is not consistent with the growth projections used to develop the CTP and the deficiency plan's action plan, modifications may ultimately be needed to both plans as well as the growth projection. This would occur through the biennial CTP, CMP, and deficiency plan update process, but the transportation mitigations originally identified by the CTP may also have to be augmented through the Traffic Impact Analysis Report process.

In either case, the prior identification of the long-range capital improvements called for in the CTP within the vicinity of the proposed change in land use, including both mitigating projects and other strategies, as well as the selection of the appropriate implementation and financing mechanisms, will reduce delays associated with compliance with this program. This approach will also allow dismissal of mitigations and related costs that are infeasible or undesirable. In either

case, too, analysis localized in the immediate vicinity of the project will continue to be included in the TIA process to address local access and congestion issues of a scale too small to be covered in the CTP or area wide deficiency plan.

4.A.2 BENEFITS OF THE PROGRAM

The Land Use/Transportation Analysis Program benefits local jurisdictions in several ways:

- Provides a set of consistent guidelines for Traffic Impact Analysis (TIA) Reports, to provide local decision makers with comprehensive data on project impacts, needed mitigations, and mitigation costs, all designed to assist in making local land use decisions.
- Provides an opportunity to be informed of land use changes and to provide substantive response to potential impacts of these changes in nearby jurisdictions.
- Creates a process to address interjurisdictional impacts.
- Provides information on which to base a more equitable allocation of costs among projects, jurisdictions, and other funding sources to mitigate transportation impacts on the CMP system.
- Will provide the process to mitigate impacts on the CMP system by appropriately phasing implementation of the actions identified within area wide deficiency plans.

4.A.3 IMPLICATIONS OF CMP REVIEW

The authority to make land use decisions rests solely with local jurisdictions. The Land Use/Transportation Analysis Program can influence land use decisions by requiring full

evaluation and disclosure of impacts to the regional transportation system, regardless of jurisdictional boundaries. Local jurisdictions are required to maintain the adopted level of service standards on the CMP system or prepare a deficiency plan, so it is essential that local jurisdictions consider the necessary actions and costs required to mitigate impacts resulting from local land use decisions. A local jurisdiction which fails to address deficiencies on the CMP System which are caused by exercise of its land use authority faces loss of the increment of local gas tax monies added by Proposition 111.

Once deficiency plans have been adopted in accordance with state law and CMA policy, the process can be streamlined so long as land use decisions are consistent with the growth assumptions, developed by SCAG in accordance with local input, on which the CTP and the deficiency plan are based. Impacts of projects that are inconsistent with the growth forecasts may not be appropriately addressed by the area wide deficiency plan, and would therefore require an analysis similar to that conducted under the guidelines that are applicable prior to deficiency plan adoption.

4.B OBJECTIVES, POLICIES, AND ACTIONS

Objective 4.1 Provide adequate mobility for people and goods by integrating consideration of land uses and the transportation system, and promoting transportation-friendly development patterns.

Policy 4.1.1 - Identify and quantify the direct and cumulative impacts of proposed land use decisions on the regional transportation system.

Action Implement the Land Use/Transportation Analysis Program through preparation of TIA Reports on projects which exceed the applicable thresholds, and certify that the analysis is consistent with the CMP guidelines.

RESPONSIBILITY: Local jurisdictions.

Action In areas where deficiency plans have been adopted, determine if proposed land use changes are consistent with growth forecasts used in development of the deficiency plan. If the project is deemed consistent, use the TIA process to develop appropriate deficiency plan phasing. If the project is deemed inconsistent, use the TIA process to submit a revision to the growth forecast and develop appropriate mitigations beyond those identified in the deficiency plan.

RESPONSIBILITY: Local jurisdictions.

Action Where area wide deficiency plans have not yet been adopted, consider a range of alternatives to meet travel demand, including capacity increases, alternative modes, demand management, land use patterns and intensities, project design, and use criteria based on the CMP TIA Report guidelines and performance measures element of the CMP as a basis for evaluating and selecting the most appropriate strategies.

RESPONSIBILITY: Local jurisdictions.

Policy 4.1.2 - Assess long-term regional transportation needs based on planned land uses, and develop the CTP and area wide deficiency plans to meet those needs.

Action In cooperation with local jurisdictions, complete the development of the CTP and area wide deficiency plans to implement it.

RESPONSIBILITY: CMA to coordinate, local jurisdictions, transit providers, SCAG, and Caltrans to participate.

Policy 4.1.3 - Develop and implement a program which apportions fairly the responsibility for mitigation of deficiencies on the CMP system among local jurisdictions and State agencies.

Action Prepare area wide deficiency plans in accordance with the CTP, and use the TIA Report process as the phasing mechanism for it.

RESPONSIBILITY: Jurisdictions participating in area wide deficiency plan preparation.

Action Include interjurisdictional notification and opportunities for potentially impacted jurisdictions to provide responses to TIA Reports into the local land use decision and impact mitigation process.

RESPONSIBILITY: Jurisdictions responsible for TIA Report preparation.

Action In association with the CTP, develop a program to provide fair, consistent, areawide mitigation of impacts and

funding of improvements on the regional transportation system needed to support economic development and local land use decisions.

RESPONSIBILITY: The CMA, local jurisdictions, the regional agency, transit providers, and air districts.

Objective 4.2 Anticipation of needs - Forecast deficiencies and avoid breakdowns of the regional transportation system through a comprehensive, systematic program.

Policy 4.2.1 - Forecast the regional transportation impacts of land use plans and projects, and identify needed improvements or mitigation strategies and their costs through the CTP process.

Action Implement and maintain a countywide database of existing and future land use, or socioeconomic data on which to base CTP and deficiency plan updates, as well as land use consistency determinations for the Land Use/Transportation Analysis Program.

RESPONSIBILITY: SCAG and the CMA, with participation by local jurisdictions and air districts.

Action Conduct annual CMP model runs.

RESPONSIBILITY: SCAG.

Policy 4.2.2 - Implement the program locally, using consistent analytical procedures and methodologies, and consider interjurisdictional as well as local impacts and solutions based on strategies developed through the CTP.

Action Implement the CTP through area wide deficiency plans and the TIA Report process.

RESPONSIBILITY: Local jurisdictions.

Action Make data available from the CMP model runs for use with local traffic models, and maintain socio-economic data sets.

RESPONSIBILITY: SCAG and the CMA.

Action Assist in making traffic, transit and TDM data available to local agencies for purposes of preparing CMP TIA reports.

RESPONSIBILITY: The CMA, Caltrans, air districts, and transit agencies.

Action Require traffic monitoring programs for certain development projects to confirm follow-through of commitments made to the agencies impacted by that development, and establish guidelines for such monitoring programs as needed.

RESPONSIBILITY: Local jurisdictions, with assistance from the CMA upon local request.

Action Identify mitigation programs which can be implemented locally through the CTP, to address cumulative development impacts which may cause deficiencies on the CMP system. Such programs should reflect the resources and administrative mechanisms currently and potentially available to local jurisdictions.

RESPONSIBILITY: The CMA and local jurisdictions.

Objective 4.3 Equity - Apportion the cost of mitigating impacts on the transportation system equitably among all who contribute to the impacts.

Policy 4.3.1 - Identify the effect of specific land use changes on the transportation system, regardless of jurisdictional boundaries, and communicate the information to all affected jurisdictions.

Action Implement the Land Use/Transportation Analysis Program through preparation of CMP TIA Reports when a project or group of projects meet the threshold criteria specified in this chapter.

RESPONSIBILITY: Local jurisdictions.

Action Participate as needed in discussions on the potential interjurisdictional impacts of land use decisions, mitigation of potential deficiencies, and fair apportionment of responsibility for mitigation. The CMA and Caltrans may participate at the request of a lead agency or a potentially impacted jurisdiction.

RESPONSIBILITY: Local jurisdictions, the CMA, Caltrans, and air districts.

Action Maintain, refine, and as needed, use the conflict resolution process provided in Appendix F to develop administrative solutions to interjurisdictional disagreements.

RESPONSIBILITY: Local jurisdictions initiate, the CMA facilitates.

Policy 4.3.2 - Provide a process to monitor and forecast the cumulative, incremental impacts of all projects, and identify measures and costs to mitigate the incremental impacts.

Action Identify the cumulative transportation impacts of projects through the CTP planning process, and use the Land Use/Transportation Analysis Program as a mechanism to monitor growth and its impacts on the transportation system.

RESPONSIBILITY: The CMA to initiate, local jurisdictions to participate.

Policy 4.3.3 - Develop or create a mechanism to finance, and fairly apportion, the cost of funding the transportation improvements and strategies needed to maintain mobility for people and goods in growing areas.

Action Use the CTP process as a way to identify the set of preferred transportation improvements and programs needed to offset the cumulative impacts of growth on the regional transportation system, and to determine how they should be funded.

RESPONSIBILITY: The CMA to initiate, local agencies, Caltrans, SCAG, and air districts to participate.

Policy 4.3.4 - Provide credit to local jurisdictions and project applicants within the jurisdiction who provide improvements to the regional transportation system

	which exceed the level of improvement required to mitigate deficiencies caused by the jurisdiction's land use decisions.	<i>Action</i>	As indicated in Policy 4.4.2, CMP TIA Reports shall be provided to the CMA and adjacent jurisdictions so that information exchange and communication can occur in concert with the permitting jurisdiction's project review schedule and prior to any approval or permit activity. Local jurisdictions which receive TIA Reports shall provide any comments within 15 working days from the date of receipt from the permitting jurisdiction. Should the comments received from adjacent jurisdictions, the CMA, Caltrans, or transit agencies recommend changes to the TIA Report, the permitting jurisdiction shall consider comments received and make changes deemed necessary by the permitting jurisdiction. Should the changes be such that the permitting jurisdiction chooses to recirculate the document, the commenting agencies will complete the review of the revised document no later than 10 working days from receipt. This process is intended to be consistent with any actions required under the local Land Use/Transportation Analysis Program.
<i>Action</i>	Through the CMPTAC, develop a process to define conditions under which credit shall be provided, the form the credit shall take, and the amount of credit to be provided for provision of improvements to the regional transportation system which exceed those required to mitigate deficiencies caused by a jurisdiction's land use decisions.		
RESPONSIBILITY: The CMA, with local jurisdiction input.			
Objective 4.4 Improve coordination among jurisdictions to ensure consistent consideration, analysis and mitigation of interjurisdictional impacts of development on the regional transportation system.			
<u>Policy 4.4.1</u> - Identify the transportation impacts of significant land use changes, regardless of jurisdictional location or political boundaries.			
<i>Action</i>	Prepare CMP TIA Reports when a project or group of projects meets the threshold criteria specified within this chapter.		
<u>Policy 4.4.2</u> - Provide a mechanism for consistent communication of impact analysis results, possible mitigations, and mitigation costs to potentially impacted jurisdictions, Caltrans, and the CMA.		RESPONSIBILITY: Local jurisdictions, the CMA, Caltrans, transit agencies.	
	interjurisdictional impacts of land use decisions, mitigation of	<i>Action</i>	Participate as needed in discussions on the potential potential deficiencies, and fair apportionment of responsibility

for mitigation. The CMA and Caltrans may participate at the request of a lead agency or a potentially impacted jurisdiction.

RESPONSIBILITY: Local jurisdictions, the CMA, and Caltrans.

Action Maintain the TIA Report guidelines and coordinate modification of the guidelines as needed. If modification is needed, the modified versions of the guidelines are to be distributed to all local jurisdictions, transit agencies, and Caltrans. Any modifications to the guidelines are to be developed and recommended by the CMPTAC which consists of staff representatives of the CMA and local jurisdictions. Modifications must ultimately be approved by the CMA Board.

RESPONSIBILITY: The CMA in coordination with local jurisdictions.

Action Maintain a log and file of TIA Reports received, formal comments related to TIA Reports received from other jurisdictions, and dates of submission of comments to the lead agency.

RESPONSIBILITY: CMA.

Policy 4.4.3 - Ensure appropriate consideration of transportation control measures and mitigation of air quality impacts in the Land Use/Transportation Analysis Program.

Action Adopt, implement, and enforce transportation control measures for the attainment of state or federal ambient air quality

standards to the extent they are required by the State Implementation Plan or air districts. Provide guidance to local jurisdictions in the inclusion of transportation control measures in development plans.

RESPONSIBILITY: Air districts.

Action Maintain the TIA Report guidelines and coordinate modification of the guidelines if needed to support mobile source air quality measures contained in air quality plans and the State Implementation Plan. If modification is needed, the modified versions of the guidelines are to be distributed to all local jurisdictions, transit agencies, and Caltrans. Any modifications to the guidelines are to be developed and recommended by the CMPTAC and approved by the CMA Board.

RESPONSIBILITY: The CMA in coordination with local jurisdictions and air districts.

Objective 4.5 Consistency - Provide a consistent, analytically sound approach to identification of impacts, evaluation of mitigations, and fair apportionment of responsibility to mitigate impacts on the CMP system.

Policy 4.5.1 - Require consistent application of the specified methodology for analyzing the impacts of land use decisions, evaluating mitigations, and estimating mitigation costs by all jurisdictions.

Action Develop the Land Use/Transportation Analysis guidelines to be adopted by local

jurisdictions, determine conformance of adopted programs, and analyze TIA Reports for CMP procedural compliance.

RESPONSIBILITY: The CMA and local jurisdictions.

Action Implement the Land Use/Transportation Analysis Program and certify that analyses are consistent with the CMP guidelines.

RESPONSIBILITY: Local jurisdictions.

Policy 4.5.2 - Provide for consistency of procedures with the requirements of other regional programs and plans.

Action Assist the air districts to identify transportation control measures or other transportation strategies which will receive credit toward significant air quality improvements.

RESPONSIBILITY: CMA.

Action If needed, assist in defining the role of air quality analysis in TIA Reports.

RESPONSIBILITY: The CMA, air districts, and local jurisdictions.

Action Monitor the development of other regional plans and programs, and identify any necessary modifications to the Land Use/Transportation Analysis Program to maintain consistency.

RESPONSIBILITY: The CMA, with local jurisdiction input.

Objective 4.6 Opportunity - Identify opportunities to improve the performance of the multimodal transportation system concurrent with development, to minimize improvement costs and reliance on public financing.

Policy 4.6.1 - Develop and implement a notification process for identifying right-of-way acquisition, lane addition, and access control opportunities on the CMP roadway system, concurrent with development.

Action In federally designated urbanized areas, notify Caltrans and the CMA of any proposed traffic-generating projects (other than a single family residence) where any portion shares a property line in common with a State highway, or is on a roadway which intersects a State highway, and is within 500 feet of that intersection, including interchange ramps.

RESPONSIBILITY: Local jurisdictions.

4.B.1 APPROACH TO THE PROGRAM

Key elements of the existing Land Use/Transportation Analysis Program are preparation of the Traffic Impact Analysis Report (TIA Report), dissemination and use of the resulting information by the local jurisdictions as a basis for making land use decisions, and mitigation of the impacts of a land use decision on the CMP system. The TIA Report has been designed to provide an improved basis for making land use decisions which could affect the regional transportation system. The TIA Report format requires use of consistent, analytically sound

procedures to forecast impacts, define and test mitigations, and to evaluate mitigation costs. Copying of TIA Reports to the CMA is required to enable the CMA to fulfill its legal obligation to monitor compliance with the program, and to provide documentation for the CMP database.

As previously noted, the content and focus of the TIA Report will change within portions of the county for which area wide deficiency plans based on the CTP have been adopted and are being implemented. Within such areas, the CMP TIA Report process can be streamlined so long as land use decisions are consistent with the growth assumptions, developed by SCAG in accordance with local input, on which the CTP and the deficiency plan are based.

Impacts of land use changes that are inconsistent with the growth forecasts on which the CTP is based may not be appropriately addressed by the area wide deficiency plan. These situations may therefore require an analysis similar to that conducted under the current guidelines, which will remain applicable to areas in which no deficiency plan has been adopted.

The current TIA Report format, required as part of the Land Use/Transportation Analysis Program , focuses on land use changes, with an emphasis on anticipating future impacts of these changes and identifying adequate mitigations. It is designed to inform local decision makers of the nature and costs of adequate mitigations so that at the local jurisdiction's discretion, adequate mitigations can be required as a condition of project approval. The TIA Report is not a deficiency plan, which is a transportation facilities oriented report required when a LOS standard is exceeded. A deficiency plan must also identify the underlying causes of the deficiency, which may be specific land use changes or development projects.

Planning for improvements only after a deficiency occurs may seriously jeopardize a jurisdiction's ability to gain needed right-of-way, develop feasible mitigations, and ensure that those who contribute to the deficiency help to solve the problem. Thus, the Land Use/Transportation Analysis Program is a significant tool within the CMP framework, along with the annual transportation modeling and area wide deficiency plans, to help anticipate and plan for future transportation improvements.

Because the CTP is designed to identify the transportation system improvements, strategies, and costs of maintaining mobility in light of cumulative growth, the planning aspect of the Land Use/Transportation Analysis Program can be both streamlined and improved in the future by reliance on the CTP and corresponding area wide deficiency plans to identify appropriate actions, rather than individual project-specific analysis. However, this approach requires consistency between the project in question and the growth assumptions used to develop the CTP and the deficiency plan.

In addition to the evaluation of specific development projects, provision is made for the traffic impact analysis of general plan revisions and amendments, and specific plans that would result in land use changes that exceed the specified thresholds.

Although the Land Use/Transportation Analysis Program's TIA Report is structured to further the goals of the CMP, local agencies and Caltrans can use the data and format for the traffic or circulation portions of California Environmental Quality Act (CEQA) and National Environmental Protection Act (NEPA) documents. An expected outcome of the program is a more efficient, consistent process of analyzing project impacts on the regional transportation system for use at all levels of government.

Mitigation of the impacts of land use decisions on CMP roadways across jurisdictional boundaries is a major concern of the program. The TIA Report and subsequent interagency review process provide one mechanism to address that concern. With the completion of the CTP and adoption of area wide, multijurisdictional deficiency plans, issues of this kind are more likely to be anticipated and avoided.

Prior to adoption and implementation of a deficiency plan, CMP TIA Reports shall be prepared by or at the direction of the local jurisdiction with land use authority when a change in land use, a development project, or at local discretion, a group of projects are forecast to generate 250 (1,000 for retail uses or projects) two-way peak hour trips based on trip generation rates published for the applicable use or uses in the Institute of Transportation Engineers' Trip Generation or other CMA-approved data source. Pass-by trips are excluded in this determination.

However, at any time other locally determined criteria may be used which are more stringent than those identified above. All TIA Reports shall be submitted to the CMA. If a TIA Report indicates that the project or projects would add 80 or more 2-way peak hour trips to a CMP arterial within an adjacent jurisdiction or 100 or more 2-way peak hour trips to a freeway within an adjacent jurisdiction, the TIA Report shall be submitted to the adjacent jurisdictions as well. The agency responsible for the TIA Report shall consider comments from other jurisdictions, the CMA, and Caltrans prior to certification of that analysis as consistent with the CMP guidelines.

The traffic volume thresholds (80 added peak hour trips to an arterial and 100 to a freeway) are intended to determine when a local jurisdiction is required to provide a copy of a TIA Report to a neighboring jurisdiction. They are not used to

determine if a TIA Report needs to be prepared. These volume thresholds also define the limit of the geographic area that needs to be analyzed in a TIA Report (i.e., the analysis does not need to be conducted for any intersections or segments when the number of project-related peak hour trips is less than the specified volume thresholds). Regardless of project-related volumes, a TIA Report analysis is only required to extend a five mile radius from the project site without regard for jurisdictional boundaries, unless a continuation of the analysis is desired by the permitting jurisdiction.

TIA Reports shall be provided to the CMA and adjacent jurisdictions so that information exchange and communication can occur in concert with the permitting jurisdiction's project review schedule and prior to any approval or permit activity. Agencies which receive TIA Reports shall provide any comments no later than 15 working days from the date the TIA Report was received by SANBAG, unless otherwise notified by the permitting jurisdiction. Should the comments received from adjacent jurisdictions, the CMA, Caltrans, or transit agencies recommend changes to the TIA Report, the permitting jurisdiction shall consider comments received and make changes deemed necessary by the permitting jurisdiction. Should the changes be such that the permitting jurisdiction chooses to recirculate the document, the commenting agencies shall complete the review of the revised document no later than 10 working days from the date unless otherwise notified. This process is intended to be consistent with any actions required under the local Land Use/Transportation Analysis Program.

The program is structured to assure that TIA Reports, and responses to reports, are conveyed between the local jurisdiction making a land use decision and potentially impacted jurisdictions. The CMA will maintain a log and file of reports

received, as well as a record of communications regarding projects.

If local jurisdictions wish communications to be on record with the Congestion Management Agency, it should receive copies to be logged and filed. The CMA is available to serve as a clearinghouse for such communications regardless of the size of the subject project. These communications will document forecast implications of land use decisions and, if deficiencies arise which are attributable to another jurisdiction's land use decisions, can be a basis for interjurisdictional sharing of the responsibility to mitigate transportation impacts. The CMP also provides a procedure for resolution of interjurisdictional conflicts (Appendix F).

Local jurisdictions which believe that portions of the CMP roadway system within their boundaries are likely to be impacted by a land use decision within an adjacent jurisdiction may request, but cannot require, that the adjacent jurisdiction prepare a TIA Report on the subject project.

Following adoption and implementation of a deficiency plan, CMP TIA Reports shall be prepared by or at the direction of the local jurisdiction to first determine if a change in land use, a development project, or a group of projects are consistent with growth assumptions contained in the CTP and deficiency plan. If consistency is determined, actions identified within the CTP and deficiency plan should be adequate to maintain the desired level of system performance if implemented at the appropriate time. It is then the role of the Land Use/Transportation Analysis Program to: 1) identify the appropriate implementation schedule for actions already identified within the deficiency plan to maintain mobility on the multimodal transportation system in the vicinity of the project, and 2) identify project-specific mitigations on local facilities not addressed by the CTP and the deficiency plan.

If the land use change, development project, or group of projects is determined to not be consistent, actions identified within the CTP and deficiency plan may not be adequate to maintain the desired level of system performance. In this case, it is the role of the Land Use/Transportation Analysis Program to: 1) identify the appropriate implementation schedule for those actions already identified within the deficiency plan to help maintain mobility on the multimodal transportation system in the vicinity of the project, 2) develop other mitigations needed to augment those previously identified in the deficiency plan to meet the mobility objectives of the CTP, 3) identify project-specific mitigations on local facilities not addressed by the CTP and the deficiency plan, and 4) provide information to be incorporated into updates of the regional growth forecast, CTP and RTP, and the deficiency plan to reestablish consistency.

Appendix C provides the detailed guidelines for preparing TIA Reports to address changes in land use, development project, or group of projects prior to adoption and implementation of an area wide deficiency plan that encompasses the project area. Variations in the program may be accommodated at the discretion of the CMA Board, but consistent implementation by all jurisdictions is essential to the program's success. Additional detailed guidance for preparing TIA Reports in areas encompassed by adopted deficiency plans will be developed through the CMP TAC and its subcommittees, and will be incorporated into Appendix C at the discretion of the CMA Board of Directors.

4.B.2 THE LAND USE/TRANSPORTATION ANALYSIS PROCESS

4.B.2.1 Steps in the Process

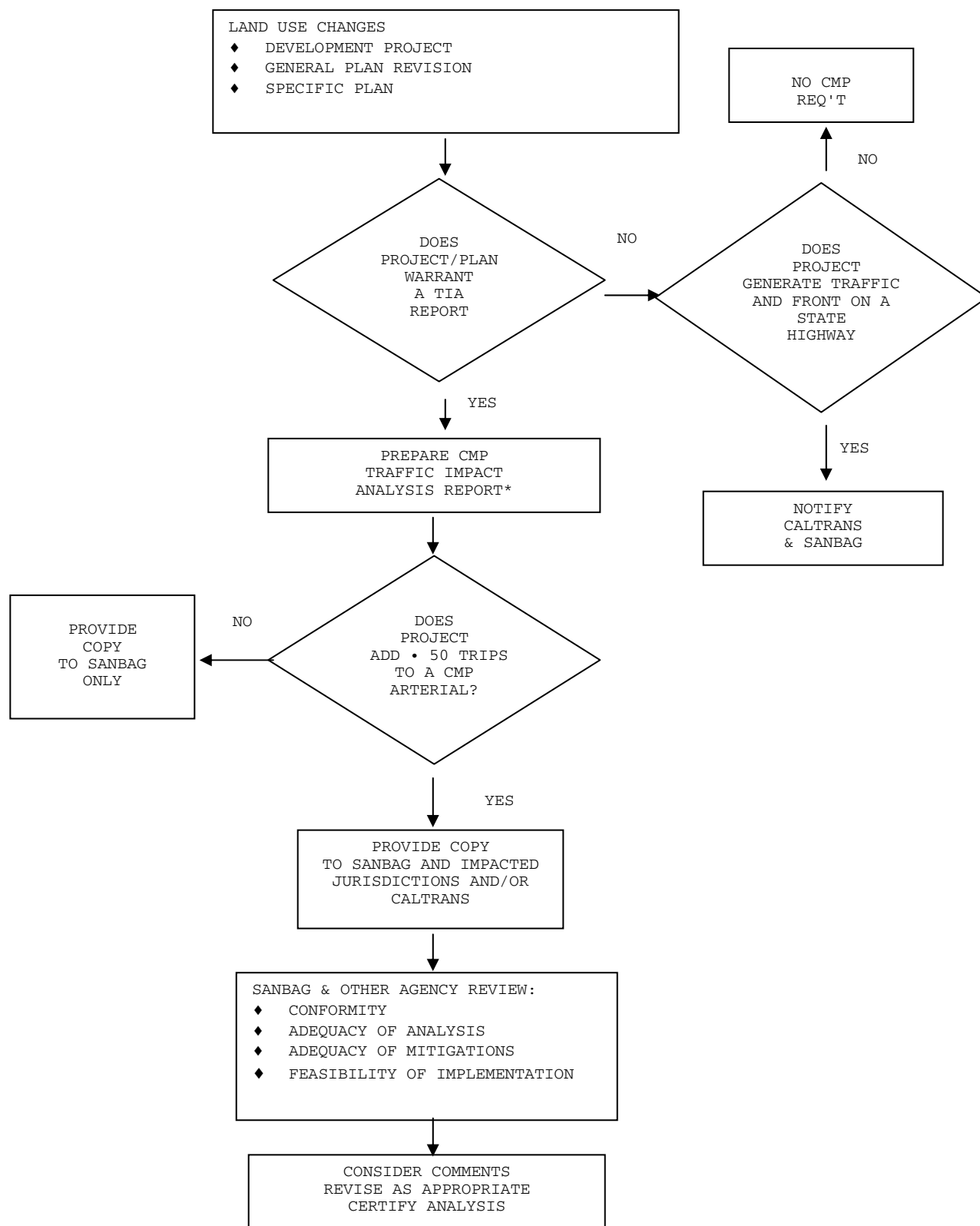
Prior to adoption of an area wide deficiency plan that encompasses the project areas, the steps

involved in the process are as follows (refer to Figure 4-1):

- A development application is submitted to a local jurisdiction, or a general plan amendment, revision or specific plan is proposed.
- If the local jurisdiction determines that project review is required, based on local criteria and thresholds or the thresholds for required preparation (Section 4.B.2.2), the local jurisdiction provides the applicant with the standardized TIA procedures and report format or otherwise arranges for the TIA Report to be prepared.
- If the specified thresholds are not met, no TIA Report is required. However, within federally designated urbanized areas, Caltrans and the CMA shall be notified by the local jurisdiction for proposed traffic-generating projects (other than a single family residence) which share a property line in common with a State highway, or where any portion is on a roadway which intersects a State highway, and is within 500 feet of that intersection, including interchange ramps. The purpose of this requirement is to provide Caltrans with advance warning of an opportunity to acquire right-of-way for additional through lanes or turning lanes at intersections on the CMP roadway system. Making the improvements after the development is already in place is much more difficult, costly, and reliant on public financing.
- Land use/transportation analysis of general plans, general plan revisions and amendments, and specific plans is required if the change in land use at

buildout meets or exceeds the specified threshold. Nearly all major general plan revisions and many specific plans are expected to exceed the thresholds for TIA Report preparation.

- The local jurisdiction is the lead agency for preparation of the TIA Report. The funding source for the preparation of the TIA will be determined at the discretion of the lead agency. The procedural guidelines and assumptions for the preparation of the TIA Report are contained in Appendix C. Issues associated with use of alternate assumptions should be settled before the analysis is actually begun. Some local jurisdictions may choose to conduct a "methodology meeting" in advance of the preparation of the TIA Report and document the expectations in writing. The CMA shall be provided a copy of documentation of procedures and assumptions that vary from those contained in Appendix C. This should be provided immediately after agreement is reached between the applicant and the local jurisdiction. The TIA Report shall include an analysis of the costs of mitigating the impacts of full project implementation, or development through the year 2020 under a planning document. The TIA Report should separately identify the costs for improvements on Caltrans roadways and the impacted CMP roadways in other jurisdictions. The TIA Report shall include a determination of any credits due the project applicant, pursuant to Section 65089.(b)(4) of the California Government Code.



*CAN BE INTEGRATED WITH ENVIRONMENTAL DOCUMENT OR CONDUCTED SEPARATELY, AT AGENCY'S DISCRETION

Figure 4-1. Flow of Recommended Land Use/Transportation Analysis Process

- The local jurisdiction shall provide a copy of the completed TIA Report to the CMA and to each potentially impacted local jurisdiction (and Caltrans for State roadways), as defined by the traffic volume thresholds of 80 added 2-way peak hour trips on arterials and 100 added trips on freeways.
- Potentially impacted jurisdictions and agencies will review the TIA Reports provided by the permitting jurisdiction (lead agency) and provide technical comments to the lead agency. At the impacted agency's discretion, technical comments may also be directed to the CMA. The CMA may also provide technical comments to the lead agency. The review period for the CMA, Caltrans, and local jurisdictions shall be no more than 15 working days from the date of receipt by the CMA unless otherwise stipulated by the lead agency. Documents received by the CMA are to be logged and filed as part of the required database on traffic impacts, and as information to be used to apportion mitigation costs among jurisdictions which can be shown to have contributed significantly to the impact.
- The local jurisdiction shall consider the responses of potentially impacted jurisdictions and Caltrans, and comments of the technical analysis by the CMA, during deliberations on project or plan approval. An impacted jurisdiction may request to meet with the impacting jurisdiction (lead agency) to resolve technical issues associated with the TIA, which may include the magnitude of an impact, location of an impact, timing of an impact, nature of the proposed mitigation, estimated cost of mitigation, and apportionment of responsibility to mitigate the impact.
- Forecast interjurisdictional impacts of a project are to be mitigated through a facility improvement or strategy developed jointly by the lead agency and impacted jurisdiction. Potential interjurisdictional impacts can be mitigated through implementation of strategies by the lead agency. However, if improvements within another jurisdiction are proposed as mitigations, financial mechanisms through which the costs to mitigate interjurisdictional impacts are addressed may include, but are not limited to, interjurisdictional agreements through which the lead (impacting) agency will reimburse the impacted jurisdiction for a proportionate share of the costs to mitigate the impact or deficiency.
- A jurisdiction in which the CMP system is impacted by another jurisdiction's land use decision should be compensated for any mitigations required within the impacted jurisdiction at the time of project approval. If this is not the case, and a deficiency plan is later required to address the impacted portion of the CMP system, the TIA Report will be used as a basis to apportion the responsibility to mitigate the deficiency within the impacted jurisdiction.
- If resolution between the lead agency and a potentially impacted jurisdiction cannot be achieved, the impacted jurisdiction may request (but cannot require) the lead agency to condition approval of a project on monitoring of traffic and/or travel characteristics to and from the project site, and provision of mitigation as warranted based on the results of monitoring. At the lead agency's discretion, this may be required of a project as a mechanism to

verify the magnitude of the impacts of a specific project on CMP roadways, and provide for mitigations as needed following project approval.

- Following consideration of any comments by potentially impacted jurisdictions and the CMA, and revisions to the TIA Report as appropriate, the lead jurisdiction certifies that the analysis is consistent with the CMP guidelines.

4.B.2.2 Criteria for TIA Report Preparation and Review

Prior to adoption and implementation of a deficiency plan encompassing the subject area, CMP TIA Reports shall be prepared by or at the direction of the local jurisdiction with land use authority when a change in land use, a development project, or at local discretion a group of projects, are forecast to add or generate 250 (1,000 for retail uses or projects) two-way peak hour trips based on trip generation rates published for the applicable use or uses in the Institute of Transportation Engineers' Trip Generation or other CMA-approved data source.

However, other locally determined criteria may be developed which are more stringent than those identified above. Individual development projects or proposed land use changes in the same geographic vicinity that can reasonably be combined into a single project for analysis purposes can be analyzed as a single project. The threshold determination is a self-certification process. A project (or projects which are examined together) which exceeds the specified thresholds or criteria, and for which development applications were submitted after the date of CMP approval by the CMA Board, requires submittal of a TIA Report.

For mixed use developments, the size of each proposed use shall be applied to the trip generation

rate for that land use type, and the results of all such calculations shall be totaled to determine if the total trip generation meets or exceeds the CMP threshold or if applicable, a more stringent local threshold.

Projects shall not be split to avoid the CMP requirements. If an additional phase of a project, when added to the preceding phases, causes the sum of the phases to exceed the threshold, the entire project must be analyzed as a unit. The analysis must be conducted when the phases are anticipated and should not wait for later phases, even if earlier phases alone would not exceed the threshold.

If it is determined that a CMP TIA Report is required, the entity with local land use authority shall prepare or cause to be prepared a Traffic Impact Analysis Report consistent with the procedure and methodology specified in Appendix C and the local jurisdiction's Land Use/Transportation Analysis Program.

If it is determined that a project qualified for the preparation of a TIA Report but no report was prepared, adjacent potentially impacted jurisdictions, SANBAG, or Caltrans may request that such a report be prepared, even though it may be after-the-fact. The permitting jurisdiction shall prepare, or cause to be prepared, a TIA Report in order to determine appropriate mitigation measures and financial responsibilities for resolution of the ongoing CMP system impacts and for developing appropriate mitigations for future development projects.

Any questions that arise on the interpretation of the program should be referred to CMA staff. It is in a jurisdiction's own interest to undertake CMP TIA Report preparation to avoid future impacts on the regional transportation system, and financial responsibility to mitigate them.

4.B.2.3 Summary of Agency Responsibilities

CMA Responsibilities

- In cooperation with local jurisdictions, develop and maintain the Land Use/Transportation Analysis guidelines to be adopted by local jurisdictions.
- Determine conformance of locally adopted Land Use/Transportation Analysis programs (Government Code Section 65089.3).
- Review TIA Reports for technical consistency.
- Participate as needed in discussions on the potential interjurisdictional impacts of land use decisions, mitigation of potential deficiencies, and fair apportionment of responsibility for mitigation, at the request of a lead agency or a potentially impacted jurisdiction.
- Maintain the TIA Report guidelines and coordinate modification of the guidelines as needed to define streamlined procedures available to local jurisdictions in which areawide deficiency plans have been adopted. Modifications are to be developed in cooperation with the CMP TAC, and approved by the CMA Board. The modified guidelines are to be distributed to all local jurisdictions, transit agencies, and Caltrans.
- Monitor the development of other regional programs and plans and identify any necessary modifications to the Land Use/Transportation Analysis Program to maintain consistency.
- Assist the air districts to identify transportation control measures or other transportation strategies which will receive credit toward significant air quality improvements
- Assist in making traffic, transit, and TDM data available to local agencies for purposes of preparing CMP TIA reports.
- In cooperation with SCAG and the local jurisdictions, plan for and implement a regional database of existing land use, approved changes in land use, and proposed changes in land use.
- In cooperation with SCAG, make data available from the CMP model for use in local models.
- Maintain a log and file of TIA Reports received, formal responses to TIA Reports received, and dates of submission of responses to the lead agency as part of the required database on traffic impacts.
- Develop guidelines, in cooperation with local jurisdictions and Caltrans, for traffic monitoring programs potentially needed to monitor traffic generated by certain development projects.
- In cooperation with local jurisdictions, develop the CTP for regional facilities and strategies, which identifies impacts and needs created by development projects, including the cumulative impacts of projects.
- Use the CTP process as a way to identify the set of preferred transportation improvements and programs needed to offset the cumulative impacts of growth on the regional transportation system, and to determine how they should be funded.

- Maintain, refine, and as needed, facilitate use of the conflict resolution procedure within the CMP to provide administrative remedies to interjurisdictional disagreements.

Local Jurisdiction Responsibilities

- Adopt and implement the Land Use/Transportation Analysis Program. The adopted program shall be generally consistent with the CMA-adopted program.
- Act as lead agency for preparation of TIA Reports.
- Implement local transportation models or analytical procedures capable of analyzing the impacts of land use decisions on the regional transportation system, both within the jurisdiction and in adjacent jurisdictions.
- Provide copies of TIA Reports directly to all other jurisdictions in which project-imposed impacts are identified.
- Provide a copy of each TIA Report to the CMA and list jurisdictions to which the TIA Report is being sent.
- Incorporate consideration of TIA Report results and responses of other jurisdictions on TIA Reports into the land use decision and traffic impact mitigation process, and certify that the analysis is consistent with the CMP guidelines.
- Participate as needed in discussions on potential interjurisdictional impacts of land use decisions, mitigation of potential deficiencies, and fair apportionment of responsibility for mitigation.

- Respond to TIA reports prepared by other jurisdictions and bring traffic impact issues to their attention.
- Within federally designated urbanized areas, notify Caltrans and the CMA of traffic-generating projects (other than single family residences) with a property line in common with a State highway or within 500 feet of a State highway along an intersecting street.
- Require traffic monitoring programs for certain development projects to confirm follow-through of commitments made to the agencies impacted by that development.
- Work with the CMA and other jurisdictions to develop the CTP, and participate in use of the CTP planning process to develop a program to comprehensively address the cumulative impacts of local land use decisions on the regional transportation system.

Southern California Association of Governments (SCAG) Responsibilities

- Conduct annual CMP model runs.
- Make models and model data available to local agencies for purposes of preparing TIA Reports.
- Maintain and update socio-economic data sets for models.
- In cooperation with the appropriate air district, assist in the quantification of air quality benefits to be derived from implementation of area wide deficiency plans.

Caltrans Responsibilities

- Make traffic count information available to local jurisdictions preparing TIA Reports.
- Review CMP TIA Reports, provide a response to the impacting jurisdiction through the CMA, and enter into discussions on the resolution of impacts on State roadways as appropriate to each situation.

Transit Agency Responsibilities

- Make transit information available to local agencies preparing TIA Reports.
- Review CMP TIA Reports as submitted by local jurisdictions, provide comments to the requesting jurisdiction, adjacent impacted jurisdictions, and the CMA, and participate in the process to resolve identified impacts.

SCAQMD and MDAQMD Responsibilities

- Identify transportation control measures or other transportation strategies which will receive credit toward significant air quality improvements if implemented through deficiency plans.
- Participate with the CMA and local jurisdictions in defining the role of air quality analysis in TIA Reports.